

United States District Court

for the
Western District of New York



United States of America

Case No. 19-mj- **5174**

v.

Jarrod K. Adams

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

COUNT 1

On or about July 16, 2019, in the Western District of New York, the defendant, **JARROD K. ADAMS**, did knowingly, intentionally, and unlawfully possess with the intent to distribute quantities of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

This Criminal Complaint is based on these facts:

☒ Continued on the attached sheet.

Complainant's signature

DAVID LAUER
SPECIAL AGENT
DRUG ENFORCEMENT ADMINISTRATION

Printed name and title

Sworn to before me and signed in my presence.

Date: August 1, 2019

Judge's signature

City and State: Buffalo, New York

HONORABLE MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE

Printed name and title

AFFIDAVIT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

DAVID LAUER, being duly sworn, deposes and says:

1. I am a Special Agent (SA) of the United States Drug Enforcement Administration (DEA) within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516 of Title 18.

2. I have been a Special Agent of the DEA since October 1998. I have had extensive training in the investigation and prosecution of large-scale illegal drug organizations. In the past 20 years, I have been responsible for the investigation and prosecution of numerous cases involving large-scale marijuana, cocaine, crack cocaine, methamphetamine, and heroin distribution organizations. I have also assisted in numerous investigations that involved the monitoring and recording of court-authorized Title III interceptions.

3. During my law enforcement career, I have participated in numerous investigations targeting individuals engaging in the trafficking and distribution of narcotics. Based on my training, experience in law enforcement, and conversations with DEA Special

Agents (SA's) and Task Force Officers (TFO's), and other law enforcement officers, I am familiar with how controlled substances are cultivated, manufactured, processed, packaged, distributed, sold and used by individuals involved in drug trafficking activities, and how drug traffickers use electronic communications to facilitate their illegal activities. As a result of my training and experience, I am familiar with the language, conduct and customs of people engaged in narcotics transactions conspiracies. My investigative experience, as well as the experience of other law enforcement agents who are participating in this investigation, serve as the basis for the opinions and conclusions set forth herein.

4. I make this Affidavit in support of an application for a Criminal Complaint charging **JARROD K. ADAMS** with possessing with the intent to distribute a substance containing methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841 (a)(1) and 841(b)(1)(C). This affidavit is submitted for a limited purpose, and as a result, I have not included details of every aspect of this investigation. I am thoroughly familiar with the information set forth in this affidavit as a result of my personal investigation, discussions with other law enforcement officers or statements provided by other law enforcement personnel, DEA Special Agents (SA) and TFO's, which have been reported to me, and examination of various documents and records in this investigation.

5. I personally have participated in the investigation of **ADAMS** for the offense set forth below and as a result, I am familiar with the facts and circumstances of this

investigation. Based upon that information, I assert that the articulated facts establish grounds for the issuance of a Criminal Complaint and an arrest warrant for **ADAMS**.

PROBABLE CAUSE

6. On July 16, 2019, at approximately 9:25 a.m., members of the Jamestown Metro Drug Task Force (JMDTF) and United States Marshals Service (USMS) traveled to 12 Bishop St., Jamestown, NY (the “residence”). Members of this law enforcement team were attempting to locate an individual believed to be at this location. This individual previously violated the conditions and terms of their Pre-Trial Supervision. As result, the USMS obtained a Federal Arrest Warrant for this individual. Upon arriving at this residence, members of this law enforcement team knocked and announced and were greeted by a tenant of the residence. The tenant agreed to speak with law enforcement personnel inside the entranceway of the residence and acknowledged that the fugitive in question was located on the second floor of the residence. After informing law enforcement personnel that the fugitive was located on the second floor, the tenant also gave law enforcement personnel verbal consent to search the residence for this fugitive.

7. Upon initiating the search for this fugitive at 12 Bishop St., Jamestown, NY, law enforcement personnel immediately encountered an unknown male (**ADAMS**) at the top of the stairs leading to the second floor where the suspected fugitive was believed to be located. Law enforcement personnel asked **ADAMS** to walk down the steps to be interviewed, as well as for officer safety, and **ADAMS** immediately ran from law enforcement personnel. Law enforcement personnel pursued this individual and discovered **ADAMS** in a second floor

bedroom attempting to throw something out the window. **ADAMS** was immediately detained by law enforcement personnel, and law enforcement discovered a large amount of suspected crystal methamphetamine possessed by **ADAMS**. **ADAMS** was attempting to throw this suspected crystal methamphetamine out a second floor window.¹ The suspected crystal methamphetamine on **ADAMS**, field tested positive for the presence of methamphetamine.

8. In addition to the detention of **ADAMS**, discovery of suspected crystal methamphetamine, arrest of the fugitive, law enforcement also observed in plain view long guns and a handgun within the residence.

9. Law enforcement personnel subsequently detained all individuals present at located at the residence, and applied for a NY State Search Warrant. On July 16, 2019, later that same date, Jamestown City Court Judge John LaMancuso authorized the search warrant of the residence.

10. On July 16, 2019, at approximately 12:48 p.m., law enforcement executed the NY State search warrant authorized for the residence. As a result, law enforcement personnel secured approximately 487.1 gross grams² of suspected crystal methamphetamine

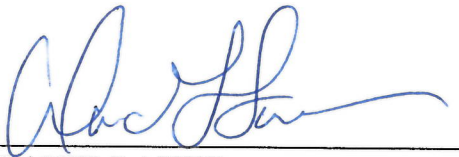
¹ It should be noted that while law enforcement personnel were detaining **ADAMS**, additional law enforcement personnel located and arrested the aforementioned fugitive and discovered two other individuals located on the second floor of the residence.

² The suspected drug evidence was turned over to DEA, at which time your affiant weighed the drug evidence and determined that it weighed 487.1 gross grams.

from a second floor bedroom.³ In addition to this quantity of suspected crystal methamphetamine, amounts of suspected crystal methamphetamine were discovered in other bedrooms located on the second floor, as well as drug paraphernalia to include digital scales and packaging material. Based on your affiant's training and experience, the other amounts of suspected crystal methamphetamine were "personal use" quantities.

11. **ADAMS** was subsequently charged with Criminal Possession of a Controlled Substance in the 2nd Degree a violation of NY State Penal Law Section 220.18 and detained.

WHEREFORE, based on the foregoing, your affiant respectfully submits that probable cause exists to believe that **ADAMS** violated Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), possession with intent to distribute methamphetamine, a Schedule II controlled substance, requests that a criminal complaint and arrest warrant as aforesaid is issued.



DAVID LAUER
Special Agent
Drug Enforcement Administration

Sworn to before me this

1st day of August 2019.



HONORABLE MICHAEL J. ROEMER
UNITED STATES MAGISTRATE JUDGE

³ The suspected crystal methamphetamine was the same suspected methamphetamine that had field tested positive and was possessed by **ADAMS**.